

Re: CG Docket Nos. 03-123 and 10-51

As an employee of a Video Relay Service (VRS) provider, I have the great fortune of assisting deaf individuals to communicate by videophone in American Sign Language using VRS. I have seen first-hand that this tool for the deaf community makes not only their time more efficient, but those of the people and businesses they are contacting, as well.

Ensuring that deaf individuals have access to VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide ?functionally-equivalent? communications.

As resources for the deaf community grow, so does awareness. There are many times a deaf party will use Sorenson, and the hearing person actually SAYS that they would have thought it was a telemarketing call, or that they would have never thought they would be able to communicate with the deaf community, on this level. Almost ALWAYS am I thanked for the wonderful service Sorenson provides to the deaf community.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion ? or force deaf users to revert to TTY communications.

TTY may be more cost effective, but it takes a lot longer for the deaf person to communicate, and leads to both parties becoming frustrated and overly impatient with the time it takes.

The services Sorenson provides make a long process into something short, effective, and cost worthy. More and more of the deaf community use our service because we provide them with a service unlike anything they have used in the past.

I was deeply disturbed to see the Commission in recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users, and it would also put a great many people out of employment. This is not a game plan that helps ANYONE, especially in these hard times and with the economic struggles we ALL face right now.

We cannot forget the deaf community's strive to overcome social barriers, and we cannot forget that each individual who works for Sorenson Communications, has a deep bond and attachment to helping better communication barriers.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels.

Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features.

Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals, especially with the economic crisis we have all faced over the last several months and some years.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available.

VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf, and I can almost predict how some of the deaf community will see it as a violation of the American's with Disabilities Act...

You now see on EVERY label out there both English and Spanish... Well, now doesn't this fall under the same heading? ASL is a secondary language... Even my 6 year old nephew is learning ASL in school. Because it is more widely used, even with hearing people. Certain signs are now over-taking just hand movement while speaking... He told me yesterday morning he wanted milk, and without even thinking about it, he signed it to me at the same time. Don't you think that this is a vast improvement in intertwining cultures that otherwise ignore and belittle one another?

If you had a deaf child? Wouldn't you want every possible option available for he or she?

Recent reports of fraud in the VRS industry are disturbing to employees who work for a company that has operated within current FCC guidelines and has worked to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I am not saying don't change the rate for VRS... I am saying to make it fair and acceptable, so that we give the deaf community every available resource, and so that people do not lose their jobs and a wonderful company be put out of business.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest

in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,

Victoria M. Faden